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July 3, 2020

Via ECF

Honorable Laura Taylor Swain United States District Judge 500 Pearl Street New York, New York 10007-1312

MEMO ENDORSED

Re: <u>United States v. Christopher</u> Ind. # 19 Cr. 875 (LTS)

Dear Judge Swain,

I am assigned to represent Mr. Christopher pursuant to CJA. Mr. Christopher is presently before this Court charged with 18 U.S.C. 922(g) (1), Possession of Ammunition by a Felon. The government has recently exchanged discovery that consists mainly of video surveillance, police documentation, cellular phone material, and search warrants. Presently, the matter is in a pre-trial motion posture, and may very well move towards a trial. Given our intention to file pre-trial motions, continue to communicate with Mr. Christopher, conduct investigations, and begin preparation for a trial, I respectfully make the following request:

Approval of CJA funds, pursuant to 18 U.S.C. § 3006A, to use the services of a full-time associate, James Healy, from my office (Sullivan Brill, LLP) to assist me in Mr. Christopher's representation. Requested services will include client-consultations, counsel visits, document review and assistance with legal research, writing, motion practice, and trial preparation. I propose an associate rate of \$105/hour. I anticipate that, in total, at the pre-trial stage, our associate will incur an estimated 50 hours.

Thank you for your consideration

Very Truly Yours,

SULLIVAN | BRILL, LLP

The request is granted. DE#42 resolved.

SO ORDERED. 7/6/2020 /s/ Laura Taylor Swain, USDJ

By: Steven Brill